

(Rev. 5/05)

**FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

(1) Keenan Wright 431055
(Name of Plaintiff) (Inmate Number)

19947

23207 Dupont Blvd Georgetown
(Complete Address with zip code)

(2) Raymond E. Blake 377092
(Name of Plaintiff) (Inmate Number)

- 07 - 7 8 3 -

(Case Number)

(to be assigned by U.S. District Court)

23207 Dupont Blvd. Georgetown, DE.
(Complete Address with zip code) 19947

(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

1. C/O means
2. Staff Lt. Michael Costello
3. Sussex Community Correctional Center
4. C. M. S. - Correction Medical Service
5. Cpl. Richard Calvert

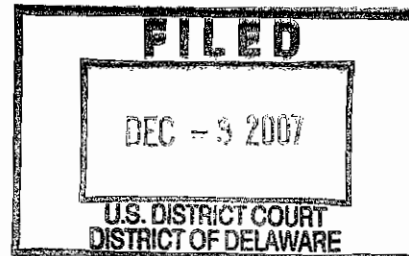
(6) Carl C. Danberg (Names of Defendants)

(7) Robert George
(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

CIVIL COMPLAINT

(yes)

Jury Trial Requested



I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

NO

182 scanned
IFP

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? • ☒ Yes • • No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☒ Yes • • No
- C. If your answer to "B" is Yes:
1. What steps did you take? we filed several grievances and negative results were brought forth at all levels.
 2. What was the result? Negative results.
- D. If your answer to "B" is No, explain why not: N/A

III. DEFENDANTS (in order listed on the caption)

- (1) Name of first defendant: correctional officer J. Mears
 Employed as correctional officer at S.V.O.P
 Mailing address with zip code: 23207 Dupont, Blvd. Georgetown, DE. 19947
- (2) Name of second defendant: Michael Costello
 Employed as Staff Lieutenant at S.V.O.P
 Mailing address with zip code: 23207 Dupont, Blvd. Georgetown, DE. 19947
- (3) Name of third defendant: Sussex Community Correctional Center
 Employed as entire organization at entire organization
 Mailing address with zip code: 23207 Dupont, Blvd. Georgetown, DE. 19947

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

4. (Name) C. M. S. - correctional / medical service
 Employed as medical service at S.V.O.P
 mailing 23207 Dupont, Blvd. Georgetown, DE. 19947
5. (Name) Cpl. Richard Calvert
 Employed as Corporal at S.V.O.P
 mailing 23207 Dupont, Blvd. Georgetown, DE. 19947

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. on 10-23-07 Richard Calvert mased petitioner Keenan wright and beat him with the can of mase so hard and bad that keenan wright had to receive intensive medical treatment / since 11-1-07 Raymond E. Blake was forced to drink rust water up until his
2. release date 2-5-08 causing him to receive intensive medical treatment. c/o mears, staff Lt. Costello, warden Robert George etc. Denied petitioner's access to the tele phones to contact their attorneys. They denied access to legal information and threatened to bring forth bodily harm
3. to petitioner's. The petitioner's received intensive sanctions in the S.V.O.P Facility for no reason at all. And there was intensive retaliation inflicted on both petitioner's when the abuse was grieved.

V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. We want to be compensated for punitive and compensatory damages for the abuse that we suffered in the amount of \$1,000,000.00 (one million dollars per defendant).

2. on 11-21-07 to 12-07-07 Theodore Rollins
was forced to drink rust water by all above
mentioned Defendants.

on 11-9-07 to 12-07-07 Takoma Medley
was forced to drink rust water by all above
mentioned Defendants.

3. on 11-1-07 to 11-28-07. Karl Owens
was forced to drink rust water by all above
mentioned Defendants.

All Petitioner's suffered massive injuries from
All said-Above mentioned Defendants who were in a
culpable state of mind. Defendants deliberately inflicted
massive amounts of injuries to Petitioner's.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25th day of November, 2007.

① Keenan Wright
(Signature of Plaintiff 1)

② Theodore Rollins
(Signature of Plaintiff 2)

③ Takoma N. Medley Sr.
(Signature of Plaintiff 3)

④ Karl Owens

⑤ Raymond E. Blake

⑥ _____

⑦ _____

3) Name: Theodore Rollins Inmate #: 392812

Complete Address: 38 Todds Lane wilmingten, DE. 19862

4) Name: Takoma medley Inmate # 257334

Complete Address: 308 Oak Rd. Seaford, DE. 19973

5) Name: Karl owens Inmate #: 428918

Complete Address: 38 Todds Lane wilmingten, DE.
19802

Additional Defendant(s)

(6) Name: Robert George

Employed As: warden at S.V.O.P

mailing address: 23207 Dupont, Blvd. Georgetown, DE.

19947

7.) Name: Carl C. Danberg

Employed as: Commissioner of Corr. at Dover

mailing address: 245 McKee RD. Dover, DE. 19904

8.) Name: Richard Norwood

Employed as: Sergeant at SVOP

mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

* 9.) Name: Adams

Employed as: Corporal at SVOP

mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

10.) Name: Hanna

Employed as: Correctional Officer at SVOP

mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

11.) Name: Hineline

Employed as: Sergeant at SVOP

mailing address: 23207 Dupont Blvd. Georgetown, DE. 19947

12.) Name: Spangler

Employed as: Sergeant at SVOP

mailing address: 23207 Dupont Blvd. Georgetown, DE.

To: Mr. Warden George,

My name is Raymond E. Blake and I am writing you on behalf of myself and the rest of the residents here at this SROP facility. Mr. Warden we have a serious problem that needs to be addressed immediately!

The water here at your facility has rust in it and it's a serious human health hazard. I along with several other residents of this facility have complained to your staff team and they're all directing the complaints to you and the maintenance people. We've written several grievances about this dire emergency only to return with negative results. No one responded! You're made aware now and if you don't solve this problem we'll get the medical courts involved. I promise!

witnesses who were and still are
affected by this STOP Rusty Water.

NAME	SBI #	POD	DATE
Anthony D. Goines	217795	Pod-10	11/9/07
David J. Leavitt	588400	Pod-10	11/9/07
W. Wise	140789	Pod-10	11-09-07
Alden S. Cannon	281691	Pod-10	11-09-07
ISAIAH SMILEY	309273	Pod-10	11-09-07
Donald G. Hamaker, Jr.	462635	Pod-10	11-09-07
E. Dwayne Bradley	4184-874	Pod-10	11/09/07
1-10-07	497031	Pod-10	11-09-07
Keynan Hunter	442215	Pod-10	11-09-07
Michael Lambert	349010	Pod-10	11-09-07
Lorenzo BLUE	498-236	Pod 10	11-09-07
2. Michael Washington	442610	Pod 10	11-09-07
3. Jayari Watson	441638	Pod 10	11-09-07
4. Keith Taylor	582538	Pod 10	11-09-07
5. Joseph WALLACE	448-424	pod 10	11.9.07
6. Charles LeCote	209822	#7	11-9-07
7. MARTY ROBERTS	174059	#7	11-9-07
8. Sorome Bell	288217	7	11-9-07
9. Keith Maye	6144911	7	11-9-07
10. David L. Johnson	453894	Pod-9	11-9-07
11. David Preston III	543791	Pod 6	11-9-07

Thomson Fisher	454002	Pod 6	11-9-07
CARLOS A. Ortiz	356803	Pod 7	11-9-07
Robert Collins	301629	Pod 7	11-9-07
Wagner Wilson	435754	Pod 7	11-9-07
Michael Allen	310099	Pod 6	11-9-07
Keith Lawson	341937	Pod 9	11-9-07
Ricky Truitt	228532	Pod 10	11-9-07
Marvin Hild	0581340	Pod 10	11-9-07
William Mone	245657	Pod 10	11-9-07
Daniel Davis	255781	Pod 10	11-9-07
Chris Eger	060719	Pod 10	11-9-07
Robert Bynthe	544981	Pod 10	11-9-07
PATRICK N. DEVONSHIRE	488531	" "	11-9-07
Manuel Vazquez	573109	Pod #10	11-9-07
Earnest Jones	529043	Pod #10	11-9-07
	569021	Pod #10	11-9-07
Lamar Jones			
Damon Jones	494346	Pod #9	11-15-07
9.			
10.			

1. Vernon Moon	465076	#9	11/16/07
2. James Wright	431053	#1	11-22-07
3. Chad My	295970	#1	11-22-07
4. Danny Doro	576292	#2	11-22-07
5. Anthony Watkins	_____	#1	11-22-07
6. Rodney SCARBERRY	_____	#1	11-22-07
7. RICH HOGAN	207204	#1	11.22.07
8. James Pettit	185146	#1	11/22/07
9. William O'Donnell	500434	#2	11/22/07
10. Henry Boss	459418	#1	11/22/07
11. Lakima Medley	257334	#1	11/22/07
12. Orlando Bland	257429	#1	11/22/07
13. Karl Owens	428-918	#1	11/22/07
14. Theodore Rollins	392812	#1	11/22/07
15.			
16.			
17.			
18.			

FORM #584

GRIEVANCE FORM

FACILITY: SVOP DATE: 11/6/07
 GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092
 CASE#: W/A 11-07-254 TIME OF INCIDENT: ON GOING
 HOUSING UNIT: POD #10

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,
 My name is Raymond E. Blake and I am writing in regards to this un sanitary, health risk to human beings water here at this SVOP facility. This water turned my wash clothe green and I believe it's the cause to my kidneys hurting every night. It's causing my back to break out in hives and my skin is peeling off on my legs as well. I'm scared to drink the liquids from this facility and liquids are essential to the human survival.

ACTION REQUESTED BY GRIEVANT: Please Respond immediately!

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11/6/07

WAS AN INFORMAL RESOLUTION ACCEPTED? (YES) X (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

Work Order
 Submitted
 11/6/07
 A

FORM #584

GRIEVANCE FORM

FACILITY: SVO P DATE: 11-16-07
 GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092
 CASE#: N/A 11-07-266 TIME OF INCIDENT: on going problem
 HOUSING UNIT: #9

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

TO whom it may concern,

I'm writting because you people keep cutting the phone lines off hindering me from communicating with my Attorney. This is a clear Federal violation of my sixth and eighth amendment right. I'm tired of this mistreatment and I've written letters to Ruth Ann Minner and Carl E. Danberg making them aware of this ongoing situation.

ACTION REQUESTED BY GRIEVANT: Please investigate and respond to this plain violation.

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11-16-07

AS AN INFORMAL RESOLUTION ACCEPTED? ☐ (YES) ☐ (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

Not Grievable
 Phones are a
 privilege
 A

FORM #584

GRIEVANCE FORM

FACILITY: SVOP DATE: 11-16-07GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092CASE#: 11A 11-07-267 TIME OF INCIDENT: on going Problem!HOUSING UNIT: #9

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern;

my name is Raymond E. Blake and I'm writing in regards to 11-13-07. The day when ~~Staff~~ Lt. Costello came to notify the pods that the water was being treated and tested. Mr. Costello informed the pods that the water was safe to drink and that we needed to keep it running for at least a half hour. Well it's still causing my kidneys to hurt and it still looks and taste like rust. what's going on here?

ACTION REQUESTED BY GRIEVANT: Please investigate this problem and get outside help on this issue!

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11-16-07

WAS AN INFORMAL RESOLUTION ACCEPTED? ☐ (YES) ☐ (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

RESENT SEE
V-07-254
dated 11/10/07
f

FORM #584

GRIEVANCE FORM

FACILITY: SVOP DATE: 11-20-07
 GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092
 CASE#: ~~11A~~ V-07-276 TIME OF INCIDENT: ON GOING Problem!
 HOUSING UNIT: POD # 9

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,
 my name is Raymond E. Blake and I'm writting ⁱⁿ regards to the ongoing mistreatment that I am receiving here at this svop facility. I was written up by C/O J. MEARS on 11-13-07 for disorderly behavior, because I asked him to cut the pod telephones out so I could contact my attorney. I went to the MDT board today and sgt. Norwood, ^{STAFF} Lt. Costello, and Mr. Adams found me guilty of the charge without me ever getting the opportunity to face my accuser. They never told me my rights and they never allowed me to appeal the decision. This is wrong and I feel like I'm being retaliated against because I confronted the warden about this rust in the water. It's illegal to deny unsentenced detainees access to the telephones!

ACTION REQUESTED BY GRIEVANT:

I would like to have an intense investigation on this whole ordeal. I would like to have a response at your earliest convenience!

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11-20-07

VAS AN INFORMAL RESOLUTION ACCEPTED? ☐ (YES) ☐ (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

DISCIPLINE IS
NOT A GRIEVANCE
ISSUE

FORM #584

GRIEVANCE FORM

FACILITY: SVOPDATE: 11-21-07GRIEVANT'S NAME: Raymond E. BlakeSBI#: 37709CASE#: 11A V-07-219TIME OF INCIDENT: on going Problem!HOUSING UNIT: POD # 1

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

TO whom it may concern,

I'm writting because I am receiving an ongoing retaliation and or harrasment from staff Lt. castello. staff Lt. castello wrote me up because I wrote him A letter asking him to enter a Appeal from the MDT board's decision in which they found me guilty of Disorderly behavior for asking an officer to utilize the telephone to contact my attorney. I read my manuel and it clearly says to write him if you have problems with the MDT board. He moved me to Pod #1 sanction pod and told me that he's going to kill me real soon!

ACTION REQUESTED BY GRIEVANT: Please help me, because I'm in Fear of my life. I feel like staff Lt. castello and the warden are trying to kill me, because I documented the many of violations in this building to the district court!

GRIEVANT'S SIGNATURE: Ray BlakeDATE: 11-21-07

WAS AN INFORMAL RESOLUTION ACCEPTED? _____

(YES) _____ (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____

DATE: _____

IF UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

cc: INSTITUTION FILE
GRIEVANT

witnesses

1. Greg Hawkes SBI# 374876

2. Robert Valentine 350269

April '97 REV

NAME	SBI#
5. Eric Tee	394876
6. Oscar Jones	194925
7. Ronald Cannon	502250
8. William Alana	555121

STAFF ISSUES
ARE TO BE
SENT TO THE
WITNESSES

FORM #584

GRIEVANCE FORM

FACILITY: SVOP DATE: 11-22-07
 GRIEVANT'S NAME: Raymond E. Blake SBI#: 377092
 CASE#: W/A V-07-281 TIME OF INCIDENT: on going Problem!
 HOUSING UNIT: POD # 1

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

To whom it may concern,
 I'm writting for documentation of the on going retaliation that I'm receiving from Warden Robert George's staff team. Every since I've complained about Warden George mistreating me and my fellow SVOP residents by making us drink rust water. I've been getting attacked by staff Lt. Costello and the rest of their goons. They've placed me on a sanction pod preventing me from contacting my attorney or family members. They've threatene to mase me and kill my Nigger ASS on several occassion. I'm in fear for my life down here and I've contacted Ruth Ann Carl C. Danberg and the Internal Affairs about this mistreatment.

ACTION REQUESTED BY GRIEVANT:

Please investigate this on going Retaliation that I am receiving at this SVOP Facility. Thanks for your time & patience!

GRIEVANT'S SIGNATURE: Ray Blake DATE: 11-22-07

WAS AN INFORMAL RESOLUTION ACCEPTED? ☐ (YES) ☐ (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

IF UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

cc: INSTITUTION FILE
 GRIEVANT

STAFF ISSUES
 ARE TO BE
 SENT TO
 WARDEN
 A

Raymond E. Blake
SB # 377092
23207 Dupont, Blvd Georgetown, DE
19947



FIRST CLASS MAIL

Clerk of the office
U. S. District court
Lock box 18
844 N. King street
wilmington, DE. 19801

U.S.M.S.
X-RAY

